

General Complaint

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

JUL 29 2019

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

BY  
DEPUTY

Sheketa Patrice Haynes

Case Number : 1:19 cv 323

List the full name of each plaintiff in this action.

VS.

Beaumont Transit system

List the full name of each defendant in this action.  
Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

N/A

Please answer the following concerning your attempt to secure counsel.

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

1. Employ Counsel
2. Court - Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas,  
P. O. Box 12487, Austin, Texas 78711.

B. List the name(s) and address(es) of the attorney(s):

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C. Results of the conference with counsel:

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II. List previous lawsuits:

N/A

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents? \_\_\_\_\_ Yes ☒ No

B. If your answer to "A" is "yes", describe the lawsuit in the space below. If there is more than one lawsuit, attach a separate piece of paper describing each.

1. Approximate file date of lawsuit: \_\_\_\_\_

2. Parties to previous lawsuit(s):

Plaintiff \_\_\_\_\_

Defendant \_\_\_\_\_

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If state, name the county.

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4. Docket number in other court. \_\_\_\_\_

5. Name of judge to whom the case was assigned.

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6. Disposition: Was the case dismissed, appealed or still pending?

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7. Approximate date of disposition. \_\_\_\_\_

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1 Sheketa Patrice Haynes  
3710 Magnolia #2702  
Beaumont, Texas 77703

Pla #2 Glenn Dale Green Jr & Gylan Montgomery Haynes  
3710 Magnolia #2702  
Beaumont, Texas # ~~77703~~ 77703

B. List the full name of each defendant, their official position, place of employment and full mailing address.

Dft #1: Beaumont Transit System  
Tina Muhammad Bus driver  
550 Milam BMT, TX 77701

Dft #2: Bill munson Manager  
550 Milam BMT, TX 77701  
Beaumont Transit System

Dft #3 Christopher S. Boone, AICP  
Director of Planning and Community Development  
801 Main Street, Suite 201 BMT, TX 77701

Attach a separate sheet for additional parties.

IV: Statement of Claim:

State as briefly as possible the fact of your case. Describe how each defendant is involved. Include the names of other persons involved with dates and places. Do not give any legal arguments or cite cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need, attaching additional pages if necessary.

On Tuesday July 16, 2019 Me my son and Grandson was on the City bus. The bus driver told me that my kids were making too much noise and interfering with the safety of other passengers, And that she was going to put us off the bus. My son yelled out again, Choo choo train and she responded by threatening to put us off the bus again. Then I asked her what was I supposed to do, these children are four and five years old, put tape over their mouths, they're just little kids. Then she proceeded to pull to the side of the road and call her manager and both her and he manager said she was within her rights to make us exit the bus. While all along I'm trying to explain that these children and one of them is developmentally challenged and has disabilities. Both her and her manager both threatened to call the police on us, and make us get off her bus.

- V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

I want to be compensated in the amount of \$1,000,000 dollars because of the pain, embarrassment, stress and anxiety this whole ordeal has caused. Also I would hope that the bus driver and her manager well be reprimanded for violating multiple rights of me and my kids.

Signed this 24th day of July, 20 19.  
(Month) (Year)

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: 7-24-2019  
Date

Sheketa Hynes  
Signature of each plaintiff